

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>GREGORY GOODWIN</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Civil Action No. 05-161 Erie</b>
	)	
<b>v.</b>	)	<b>Judge Maurice B. Cohill, Jr.</b>
	)	
<b>ACCURIDE ERIE, L.P.</b>	)	
	)	<b>Electronically Filed</b>
<b>Defendant.</b>	)	

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME  
TO FILE BRIEF IN OPPOSITION TO SUMMARY JUDGMENT**

**AND NOW COMES** Plaintiff Gregory Goodwin, by and through his counsel, Joseph H. Chivers, Esquire, and hereby respectfully requests an extension of time to file his Brief in Opposition to Defendant’s Motion for Summary Judgment in the above matter.

Plaintiff’s Brief in Opposition to Summary Judgment is due on September 29, 2006. The Parties, however, are currently discussing settlement. Plaintiff seeks an extension of two weeks (or until October 13, 2006) to respond to Defendant’s Motion in order to complete settlement efforts.

**WHEREFORE**, it is respectfully requested that Plaintiff be granted an extension of time,

until October 13, 2006, to file his Brief. A proposed order is attached.

Respectfully submitted,

s/Joseph H. Chivers

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Counsel for Plaintiff

Gregory Goodwin

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DATED: September 29, 2006